

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KAREN WALD,

Plaintiff,

-against-

17-CV-3560 (WFK)(SJB)

THE DEPARTMENT OF EDUCATION
OF THE CITY OF NEW YORK, and
THE CITY SCHOOL DISTRICT F
THE BOARD OF EDUCATION
OF THE CITY OF NEW YORK

Defendants,

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DECLARATION OF PATRICIA CRISPINO

1. I am a District Representative for the United Federation of Teachers. (UFT) Ms. Wald who was a member of the UFT, requested my assistance in obtaining a reasonable accommodation because she had a very significant illness.
2. In September or early October 2015, I contacted Superintendent Mills on behalf of Ms. Wald to request a reasonable accommodation.
3. I explained to Ms. Mills that Ms. Wald needed a reasonable accommodation due to her serious medical condition. Specifically, I advised Ms. Mills that Ms. Wald was looking for a more compressed schedule.
4. I explained all this fully as I was aware that Ms. Mills had the capability and flexibility to accommodate and change schedules. As a UFT representative I had first-hand knowledge of Ms. Mills' ability to make these changes as she had made similar changes in the past for several

teachers (e.g., adding hours, compressing schedules, changing schedules), including for some teachers who did not have a serious medical condition like Ms. Wald.

5. However, after requesting the reasonable accommodation mentioned above on behalf of Ms. Wald, Ms. Mills simply responded “no.” Instead of asking for additional information regarding the necessity of the accommodation, Ms. Mills stated that if Ms. Wald needed an accommodation she could give up her additional “pro-rata hours” that had been awarded to adult education teachers in a previous arbitration.

6. I explained to Ms. Mills that Ms. Wald was not looking for a reduction in hours, but rather a more compressed schedule. Again, Ms. Mills’ response was “no,” with no further discussion.

I PATRICIA CRISPINO, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct this 25th day of January 2019.



PATRICIA CRISPINO